## UNITED STATES DISTRICT COURT WESTERN DISTRICT OF VIRGINIA (ROANOKE DIVISION)

| JEFFREY S. MEADOWS,                        | )                              |   |
|--|--------------------------------|---|
| Plaintiff,                                 | )                              |   |
| v.   | )                              |   |
| NORTHROP GRUMMAN INNOVATION SYSTEMS, INC., | ) ) Case No. 7:19-cv-00394-MFU | U |
| BAE SYSTEMS, INC.,                         | )                              |   |
| and  | )                              |   |
| BAE SYSTEMS ORDNANCE SYSTEMS, INC.,        | )<br>)<br>)                    |   |
| Defendants.                                | )                              |   |

## NORTHROP GRUMMAN INNOVATION SYSTEMS, INC.'S NOTICE OF CONSENT TO REMOVAL UNDER 28 U.S.C. § 1446(b)(2)

Defendant Northrop Grumman Innovation Systems, Inc. ("NGIS"), by counsel, files this Notice of Consent to Removal in response to Defendants BAE Systems, Inc. and BAE Systems

Ordnance Systems, Inc.'s (collectively, "BAE") Notice of Removal and states as follows:

- On or about April 24, 2019, Plaintiff Jeffrey S. Meadows ("Meadows") filed an Amended Complaint in the Circuit Court of Montgomery County Virginia<sup>1</sup> against Defendants for various claims, including claims against NGIS for common law conspiracy and Virginia Statutory Business Conspiracy (the "Complaint").
- 2. NGIS was served with the Complaint on May 3, 2019.

<sup>1</sup> Styled Jeffrey S. Meadows v. Northrop Grumman Innovation Systems, Inc., BAE Systems, Inc., And BAE Systems Ordnance Systems, Inc., Case No. CL18001006-00.

- 3. On May 24, 2019, BAE filed a notice of removal to federal court. (ECF Docket No. 1).
- 4. Defendant NGIS agrees with the notice of removal and consents to removal of this suit to federal court for the reasons stated in BAE's Notice of Removal.

Respectfully submitted,

NORTHROP GRUMMAN INNOVATION SYSTEMS, INC.

By: s/James K. Cowan, Jr.
Counsel

James K. Cowan, Jr. (VSB 37163) Eric D. Chapman (VSB 86409) CowanPerry PC 250 South Main Street, Suite 226 Blacksburg, Virginia 24060 Telephone: (540) 443-2850 Facsimile: (888) 755-1450 jcowan@cowanperry.com echapman@cowanperry.com

Counsel for Northrop Grumman Innovation Systems, Inc.

## CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and exact copy of the foregoing Notice was

filed via ECF this 24th day of May, 2019:

John R. Thomas, Jr., Esq. Healy Hafemann Magee LLC 11 Franklin Road, S.W. P.O. Box 8877 Roanoke, Virginia 24014 jt@hhm.law

John P. Fishwick, Esq.
Monica L. Mroz, Esq.
Carrol M. Ching, Esq.
Daniel J. Martin, Esq.
Fishwick & Associates PLC
30 Franklin Road, Suite 700
Roanoke, Virginia 24011
john.fishwick@fishwickandassociates.com
monica.mroz@fishwickandassociates.com
carrol.ching@fishwickandassociates.com
daniel.martin@fishwickandassociates.com

Counsel for Plaintiff, Jeffrey S. Meadows

Thomas M. Winn, III, Esq. (VSB # 35758) winn@woodsrogers.com
Joshua R. Treece, Esq. (VSB #79149) jtreece@woodsrogers.com
WOODS ROGERS PLC
10 South Jefferson Street, Suite 1400
Roanoke, Virginia 24011

Telephone: (540) 983-7529 Facsimile: (540) 983-7711

Counsel for Defendants BAE Systems, Inc. and BAE Systems Ordnance Systems, Inc.

s/James K. Cowan, Jr.